

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NICHOLE ADAMS-FLORES,

18-cv-12150 (JMF) (KHP)

Plaintiff,

-against-

**DECLARATION OF JOSEPH B.
REYNOLDS IN SUPPORT OF
DEFENDANTS' MOTION IN
LIMINE**

THE CITY OF NEW YORK, DEPARTMENT OF
CORRECTIONS, CYNTHIA BRANN,
Commissioner of Dept. of Corrections, JEFF
THAMKITTIKASEM, Former Chief of Staff of
Dept. of Corrections, and MARTIN MURPHY,
former Chief of Department of Dept. of
Corrections

Defendants.

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Joseph B. Reynolds, declares, pursuant to 28 U.S.C. § 1746 and under the penalty of perjury, that the following is true and correct:

1. I am an Assistant Corporation Counsel in the office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for Defendants in the above-captioned action.
2. I respectfully submit this declaration in support of Defendant's Motion in Limine.
3. Attached hereto as Exhibit A is the expert report of Michael J. Vernarelli, Ph.D., which is Plaintiff's proposed exhibit 21 in the parties' Joint Pre-Trial Order ("JPTO") (ECF No. 209).
4. Attached hereto as Exhibit B is Plaintiff's 2019 federal tax return.
5. Attached hereto as Exhibit C is Plaintiff's 2020 federal tax return.

6. Attached hereto as Exhibit D are relevant excerpts from “Plaintiff’s Response to Defendants’ First Combined Set of Interrogatories and Request for the Production of Documents,” dated August 11, 2021.
7. Attached hereto as Exhibit E is Plaintiff’s proposed JPTO Exhibit 12.
8. Attached hereto as Exhibit F is Plaintiff’s proposed JPTO Exhibit 13.

WHEREFORE, Defendant respectfully requests the Court grant Defendant’s Motion in Limine and grant any such other and further relief as the Court may deem just and proper.

Dated: New York, New York
August 28, 2023

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel of the
City of New York
Attorney for Defendants
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By: /s/ **Joseph Reynolds**
Joseph B. Reynolds
Assistant Corporation Counsel

To: via ECF
Plaintiff’s counsel